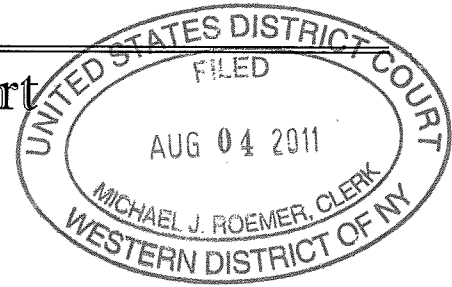


United States District Court
for the
Western District of New York



United States of America)

v.)

JOHN CRANDALL)

Defendant)

Case No. 11-M-

1084

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

Between on or about July 24, 2011 and continuing until on or about August 4, 2011, in the Western District of New York, the defendant violated Title 18, United States Code, Section 2422(b), an offense described as follows:

attempting to use interstate facilities to persuade, induce, entice and coerce an individual who has not attained the age of 18 to engage in in sexual activity for which any person can be charged with a criminal offense.

This criminal complaint is based on these facts:

SEE ATTACHED AFFIDAVIT

☒ Continued on the attached sheet.

Complainant's signature

Michael K. Hockwater, Task Force Officer, FBI

Printed name and title

Sworn to before me and signed in my presence.

Date: August 4, 2011

City and State: Buffalo, New York

Judge's signature

JEREMIAH J. MCCARTHY
United States Magistrate Judge

Printed name and title

AFFIDAVIT IN SUPPORT OF CRIMINAL COMPLAINT

STATE OF NEW YORK)
COUNTY OF ERIE) SS:
CITY OF BUFFALO)

I, Michael Hockwater, being duly sworn, deposes and says:

1. I am a Detective with the Cheektowaga Police Department and I am a Task Force Officer with the Federal Bureau of Investigation (FBI). I am currently assigned to the Buffalo Field Office Innocent Images National Initiative which targets individuals involved in the on-line sexual exploitation of children. As part of these duties, I have become involved in the investigation of suspected violations of Title 18, United States Code, Sections 2251, 2252, 2252A, 2422, and 2423.

2. I make this affidavit in support of a criminal complaint charging JOHN CRANDALL with violating Title 18, United States Code, Section 2422(b). The statements contained in this affidavit are based on my involvement in this investigation, as well as information provided to me by other law enforcement officers involved in this investigation, information provided to me by witnesses, and upon my training and experience. Because this affidavit is being submitted for the limited purpose of seeking a

criminal complaint, I have not included each and every fact known to me concerning this investigation.

3. Title 18, United States Code, Section 2422(b) makes it a federal crime to use the mail or any facility or means of interstate or foreign commerce, or within the special maritime and territorial jurisdiction of the United States to knowingly persuade, induce, entice or coerce any individual who has not attained the age of 18 years, to engage in prostitution or any sexual activity for which any person can be charged with a criminal offense, or to attempt to commit these acts.

4. Adam4adam.com is a social networking/dating website that provides users with e-mail and instant messaging/chat services, and allows users to communicate via the Internet with other Internet users. Yahoo.com is also a website that, among other functions, provides users with e-mail and instant messaging/chat services, and allows users to communicate via the Internet with other Internet users. The chat program provided by Yahoo.com is referred to as "Yahoo instant messenger," or "YIM."

5. Between on or about July 24, 2011, and August 4, 2011, using an undercover identity, law enforcement officers have corresponded with JOHN CRANDALL through YIM, and other websites.

Through these chats, CRANDALL has discussed his sexual interest in children.

6. CRANDALL uses screen-name "skyflyinboy" on A4A and the screen name "flyboijohn" on YIM. I know that CRANDALL is the individual associated with these screen-names, because his profile picture on A4a corresponds with a photo of JOHN CRANDALL obtained from the New York DMV. On a past occasion, using an undercover identity, I corresponded with CRANDALL as "skyflyinboy" on A4A, and then continued the correspondence with him on YIM as "flyboijohn," at his request. In addition, based on information obtained from the Internet, I know that JOHN CRANDALL resides in the Buffalo, New York area, and that he is a flight attendant. This is consistent with his screen-name and profile information on A4A.

7. On August 3, 2011, using an undercover identity, I engaged in a chat with CRANDALL over YIM wherein I stated that I was in contact with a 14 year old minor. During the chat, CRANDALL discussed engaging in sexual activity with the minor, and then wrote, "bring him here tonight." See Exhibit 1.

8. CRANDALL went on to ask for a physical description of the minor, saying, "dude, I will do anythign for his ass," and "I want to fuck him with you man." See Exhibit 1.

9. CRANDALL then engaged in a discussion about who would have sex with the minor first. See Exhibit 1.

10. On August 3, 2011, I exchanged text messages with CRANDALL, using the telephone of a cooperating witness who is an acquaintance of CRANDALL. During the texts, CRANDALL asked for a photo of the minor, and asked, "Think he's game got getting fucked?" Finally, he directed me to call him on the morning of August 4, 2011, and that he would give me his address and directions to his house.

11. On August 4, 2011, upon a request from CRANDALL for a photo of the minor, a cooperating witness (whose identity corresponds with the undercover online identification I used to communicate with CRANDALL online), being aided by law enforcement officers, sent a photo of a fictitious minor to CRANDALL via text messaging. Immediately after receiving the photo, CRANDALL replied via text, "So how soon can u be here? I don't have a ton of time".

12. A law enforcement officer then directed the cooperating witness to place a consensual telephone call to CRANDALL. I listened to the call. During the call, CRANDALL provided his home address, and asked, "so he knows that we're both going to fuck him?"

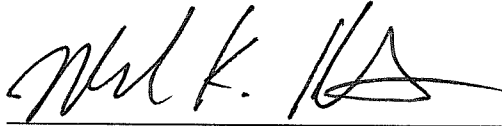
13. The home address given by CRANDALL corresponds with utilities registered in the name of JOHN CRANDALL.

14. Further calls were placed from the cooperating witness to CRANDALL at the direction of law enforcement, during which CRANDALL continued to express his desire to engage in sexual activity with a minor, and asked whether the minor is able to sneak out of his parents house later in the evening. CRANDALL made plans to communicate with the cooperating witness later in the evening to solidify plans to meet with the minor after 9:00 P.M.

15. Based on the above information, there is probable cause to believe that JOHN CRANDALL knowingly used facilities of interstate commerce to attempt to persuade, induce, entice and coerce an individual who had not attained the age of 18 to engage in sexual activity for which any person can be charged with a criminal offense, in violation of Title 18, United States Code, Section 2422(b).

16. It is further respectfully requested that this Court issue an Order sealing, until further order of this Court, all

papers submitted in support of this Complaint, including the Affidavit, and Exhibit 1.

A handwritten signature in black ink, appearing to read "Michael Hockwater", written over a horizontal line.

MICHAEL HOCKWATER
Task Force Officer
Federal Bureau of Investigation

Sworn to before me this
_____ day of August, 2011

HON. JEREMIAH J. MCCARTHY
United State Magistrate Judge

Exhibit 1

UC 1616 chat log.txt

undercoverid (8/3/2011 11:31:19 AM): i had to work late... sucked... your tied up all day
 flyboijohn (8/3/2011 11:31:17 AM): most of the day. do you work today?
 undercoverid (8/3/2011 11:32:14 AM): yeah but tomorrow im open..
 flyboijohn (8/3/2011 11:32:46 AM): I'm only free before noon tomorrow
 flyboijohn (8/3/2011 11:32:53 AM): then I'll be gone for 20 days
 undercoverid (8/3/2011 11:33:32 AM): too bad.. i think i got a new bttm!!
 flyboijohn (8/3/2011 11:33:41 AM): who?
 flyboijohn (8/3/2011 11:33:42 AM): how old
 flyboijohn (8/3/2011 11:33:44 AM): pics?
 undercoverid (8/3/2011 11:34:51 AM): met him last nite.. friend of a guy at work..
 14
 flyboijohn (8/3/2011 11:35:00 AM): 14?
 flyboijohn (8/3/2011 11:35:01 AM): seriously
 flyboijohn (8/3/2011 11:35:07 AM): how do you know he'll bottom?
 flyboijohn (8/3/2011 11:35:14 AM): does your friend at work fuck him?
 flyboijohn (8/3/2011 11:35:18 AM): haha, details!
 undercoverid (8/3/2011 11:36:18 AM): he was talkin about it last night.. hes don it before...
 undercoverid (8/3/2011 11:37:29 AM): u goin back to europe then?
 flyboijohn (8/3/2011 11:38:27 AM): no driving to San Francisco
 flyboijohn (8/3/2011 11:38:36 AM): your friend has fucked him before?
 flyboijohn (8/3/2011 11:38:45 AM): or the 14yo was talking about it?
 undercoverid (8/3/2011 11:40:14 AM): the 14 yo said hes into it .. probly could have happened last night if i had somwhereto take him
 flyboijohn (8/3/2011 11:40:44 AM): HERE!
 flyboijohn (8/3/2011 11:40:48 AM): bring him here tonight
 flyboijohn (8/3/2011 11:40:54 AM): wha's he look like?
 flyboijohn (8/3/2011 11:41:13 AM): you saw him at the store? or talked to him online?
 undercoverid (8/3/2011 11:41:52 AM): saw him in store... hung out after work in lot
 flyboijohn (8/3/2011 11:42:07 AM): got his number?
 undercoverid (8/3/2011 11:43:02 AM): not yet.. hes hot ... like a football playr
 undercoverid (8/3/2011 11:43:23 AM): i could tell he was into me
 flyboijohn (8/3/2011 11:43:24 AM): bigger build football player?
 undercoverid (8/3/2011 11:43:32 AM): no skinny
 flyboijohn (8/3/2011 11:43:41 AM): dude, I will do anythign for his ass
 undercoverid (8/3/2011 11:44:48 AM): ill find out later... maybe i can get him to hang with us tomorrow in the am??
 flyboijohn (8/3/2011 11:44:59 AM): ok
 flyboijohn (8/3/2011 11:45:01 AM): definite ok
 flyboijohn (8/3/2011 11:45:05 AM): or late tonight
 flyboijohn (8/3/2011 11:45:20 AM): he said he'd be into a 3sum? getting tag teamed?
 flyboijohn (8/3/2011 11:45:28 AM): what did you talk to him about? how did it come up
 undercoverid (8/3/2011 11:46:30 AM): heard he was gay... he said hes messed round befor.. he was hittin on me
 flyboijohn (8/3/2011 11:46:47 AM): you were alone with him?
 undercoverid (8/3/2011 11:47:45 AM): there was a few people hanging out but i talkd to him on the side... noone else knows.. i dont want to screw it up..
 flyboijohn (8/3/2011 11:47:59 AM): how tall is he?
 undercoverid (8/3/2011 11:49:00 AM): like me .. lt brown hair.. keep between us right..
 flyboijohn (8/3/2011 11:49:14 AM): who would I tell? haha
 flyboijohn (8/3/2011 11:49:22 AM): but fuck I want to fuck him with you man
 undercoverid (8/3/2011 11:49:55 AM): ill work on it lol... yur place free tomorrow then
 flyboijohn (8/3/2011 11:50:25 AM): sure
 flyboijohn (8/3/2011 11:50:27 AM): I will make sure
 flyboijohn (8/3/2011 11:50:29 AM): and tongiht too
 flyboijohn (8/3/2011 11:50:30 AM): lol
 flyboijohn (8/3/2011 11:50:40 AM): and air conditioned lol
 undercoverid (8/3/2011 11:50:54 AM): its goon b hot!!!!!!!!!!!!!!

UC 1616 chat log.txt
flyboijohn (8/3/2011 11:51:15 AM): it will be if it works
flyboijohn (8/3/2011 11:51:44 AM): what was he wearing?
undercoverid (8/3/2011 11:53:16 AM): hes said hes stayin with his mom.. so maybe
ican get him out in the mrning easier.. ur still at same place right... i dont know
if it still in gps
flyboijohn (8/3/2011 11:54:55 AM): no new place... call me and I'll give you the
directions whe you're ready to come over
undercoverid (8/3/2011 11:55:24 AM): can u still hook me up with the vids too...
flyboijohn (8/3/2011 11:55:33 AM): if you bring him over, yes
flyboijohn (8/3/2011 11:55:35 AM):
undercoverid (8/3/2011 11:56:25 AM): i'll work it tonite... ill talk him onto it...
ill text u latr on...
flyboijohn (8/3/2011 11:56:39 AM): he look smooth?
flyboijohn (8/3/2011 11:56:45 AM): what was he wearing?
undercoverid (8/3/2011 11:57:26 AM): CLEAN... like skater wear
flyboijohn (8/3/2011 11:57:39 AM): so fucking hot
flyboijohn (8/3/2011 11:57:50 AM): IW ant to eat his ass!
flyboijohn (8/3/2011 11:57:57 AM): haha you wanna fuck him before or after I load
him?
undercoverid (8/3/2011 11:58:51 AM): see how it goes... its been a while for me...
might not last to long lol
flyboijohn (8/3/2011 11:59:00 AM): then you first
flyboijohn (8/3/2011 11:59:06 AM): you know I love to fuck a cum filled hole
undercoverid (8/3/2011 11:59:44 AM): let me work it... ill get u later on
flyboijohn (8/3/2011 11:59:53 AM): how can you find him?
undercoverid (8/3/2011 12:03:08 PM): he said hangs out at the park down on losson...
so im goin there latr.. im gonna tell him were hanging out at ur place to watch vids
and stuff..
flyboijohn (8/3/2011 12:03:32 PM): porn vids?
undercoverid (8/3/2011 12:04:19 PM): yeah to get him in the mood..lol
flyboijohn (8/3/2011 12:05:55 PM): hot
undercoverid (8/3/2011 12:07:30 PM): im out.. gotta go shoppin... ill text u later
please keep between me and u..
flyboijohn (8/3/2011 12:08:16 PM): I would never tell anyone man. I promise. I'm def
lookin forward to this!